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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

AMERICAN PREPARATORY SCHOOLS,  
INC., a Utah Corporation,

Plaintiff,

vs.

NEVADA CHARTER ACADEMIES d/b/a  
AMERICAN PREPARATORY ACADEMY—  
LAS VEGAS, a Nevada Corporation,  
RACHELLE HULET, an individual,

Defendants.

Case Number:  
2:20-cv-01205-JAD-NJK

**ORDER TO  
EXTEND TIME FOR FILING OF  
RESPONSES TO THIRD AMENDED  
COMPLAINT**

**(SECOND REQUEST)**

Plaintiff American Preparatory Schools, Inc. (“Plaintiff”), by and through its counsel of record, the law firms of Parr Brown Gee & Loveless and the Takos Law Group, LTD., Defendant Nevada Charter Academies d/b/a American Preparatory Academy – Las Vegas (“APA”), by and through its counsel of record, the law firms of Lipson Neilson P.C. and Hayes Wakayama, and Defendant Rachelle Hulet (“Hulet”), by and through her counsel of record, the law firm of Hogan Hulet, (collectively the “Parties”), hereby stipulate and agree as follows:

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1           1.       On December 16, 2020, this Court filed an Order instructing the Plaintiff to file its  
2 Third Amended Complaint no later than December 18, 2020, and Defendants to file their responses  
3 to Plaintiff's Third Amended Complaint by January 15, 2021 [ECF No. 82].

4           2.       On December 16, 2020, Plaintiff filed its Third Amended Complaint [ECF No. 83].

5           3.       On January 12, 2021, a Notice of Appearance of Co-Defense Counsel was filed  
6 noticing the appearance of the law firm of Hayes Wakayama as co-defense counsel for Defendant  
7 APA, together with the law firm of Lipson Neilson [ECF No. 84].

8           4.       The Parties have agreed to extend the deadline for Defendants' to file their  
9 responses to Plaintiff's Third Amended Complaint for two weeks from January 15, 2021 up  
10 through and including January 29, 2021.

11           5.       The reason for the Parties' request for extension is that in addition to calendaring  
12 delays caused by the ongoing pandemic, Defendant APA learned that insurance defense counsel  
13 could not prosecute counterclaims under the subject policy. It took weeks for Defendant APA's  
14 Board to vet, approve and retain separate counsel to prosecute counterclaims. The foregoing  
15 delays necessitated the instant stipulation/request for an extension.

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1           6.       This is the second submission of this request for extension of time to file responses  
2 to Plaintiff's Third Amended Complaint.

3 IT IS SO ORDERED.

4 Dated: January 20, 2021

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United States Magistrate Judge